Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of)	
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Broadcast Localism)	MB Docket 04-233
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To: The Commission Marlene H. Dortch, Secretary

COMMENTS

- 1. On behalf of Gray Television Inc., WJHG, Panama City, FL, we hereby submit comments in the Broadcast Localism Rulemaking.
- 2. While the FCC recognizes that the "voluminous record here demonstrates that some broadcasters devote significant amounts of time and resources to airing programming that is responsive to the needs and interests of their communities of license", the Commission unfortunately relies on some commenters to conclude that "the dialogue between broadcasters and their audiences concerning stations' localism efforts is not ideal."
- 3. We strongly believe that the FCC's conclusion is wrong. We at WJHG are committed to serving our audience and community of license. To demonstrate our record, please find as attachment A issues/programs lists for WJHG for the period of 2007-2008.

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 $^{^{\}rm 1}$ See Broadcast Localism, FCC 07-218, released January 24, 2008 at para. 1.

² Id. at para. 2.

Also please find as attachment B a sample of the letters from our community leaders and

members of our audience discussing some of our local efforts.

4. We strongly urge the FCC to reject the conclusion that stations are not

serving their local communities and reject the new proposals contained in the rulemaking,

including, but not limited to, Enhanced Disclosure, posting public files on the internet,

community advisory boards, 24/7 physical presence at each broadcast facility,

reintroduction of renewal processing guidelines and main studio rule revision.

Respectfully submitted,

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